

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JANE DOE	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 1:22-cv-00545 (CMH/TCB)
	:	
CENK SIDAR	:	
	:	
Defendant.	:	

MEMORANDUM IN SUPPORT OF CONSENT MOTION TO SEAL

Defendant Cenk Sidar, by counsel, states as follows for its memorandum in support of his Consent Motion to Seal:

Pursuant to Local Rule 5, a motion to seal must be accompanied by a “non-confidential memorandum” containing the following: 1) A non-confidential description of what material has been filed under seal; (2) A statement why sealing is necessary, and why another procedure will not suffice, as well as appropriate evidentiary support for the sealing request; (3) References to the governing case law, an analysis of the appropriate standard to be applied for that specific filing, and a description of how that standard has been satisfied; (4) Unless permanent sealing is sought, a statement as to the period of time the party seeks to have the matter maintained under seal and how the matter is to be handled upon unsealing.

Here, Defendant, with the consent of Plaintiff, seeks to permanently seal Exhibit 1 to its Motion *In Limine* to Preclude Plaintiff from Using Certain Purported Text Messages for Any Purposes at Trial. Because Exhibit 1 consists entirely of alleged text messages of a private and

personal nature, there is no public interest in the document. *See Gordon v. Nexstar Broad., Inc.*, No. 118CV00007DADJLT, 2019 WL 2615753, at *2 (E.D. Cal. June 26, 2019).

WHEREFORE, Defendant Cenk Sidar, by counsel, requests that this Court grant his Consent Motion to Seal.

United States District Court Judge
Eastern District of Virginia